

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**
No. 1:23-md-3076-KMM/EIS

In re

*FTX Cryptocurrency Exchange Collapse
Litigation*

This Document Relates to the Administrative
Class Action Complaint and Demand for Jury
Trial as to the Bank Defendants (ECF No. 155)

**DECLARATION OF LARA SAMET BUCHWALD IN SUPPORT OF DEFENDANTS
DELTEC BANK AND TRUST COMPANY LIMITED AND JEAN CHALOPIN'S
OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL
AND EXPEDITE DISCOVERY**

I, Lara Samet Buchwald, declare as follows:

1. I am a partner of the law firm Davis Polk & Wardwell LLP, counsel to Defendants Deltec Bank and Trust Company Limited and Jean Chalopin, and I have filed a Certificate of Understanding in the above-captioned matter. I have personal knowledge of the matters set forth in this Declaration.

2. Attached as Exhibit A is a true and correct copy of Plaintiffs' First Set of Requests for Production to Defendant Deltec Bank & Trust Company, Limited, dated December 22, 2023.

3. Attached as Exhibit B is a true and correct copy of Plaintiffs' Notice of Taking Video Deposition of Defendant Deltec Bank & Trust Company, Limited, dated December 22, 2023.

4. Attached as Exhibit C is a true and correct copy of Plaintiffs' First Set of Requests for Production to Defendant Jean Chalopin, dated December 22, 2023.

5. Attached as Exhibit D is a true and correct copy of Plaintiffs' Notice of Taking Video Deposition of Defendant Jean Chalopin dated December 22, 2023.

6. Attached as Exhibit E is a true and correct copy of an order issued by Judge Moore, dated December 18, 2023 (ECF No. 422).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2024, at New York, New York.

/s/ Lara Samet Buchwald

Lara Samet Buchwald